

1 THE HONORABLE RICHARD A. JONES

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 COZEN O'CONNOR,

11 Plaintiff,

12 v.

13 STB, INC. d/b/a STB LIFESAVING
14 TECHNOLOGIES, INC.,

15 Defendant.

CASE NO.: 2:17-CV-00139-RAJ

**DECLARATION OF
WILLIAM H. WALSH IN SUPPORT
OF PLAINTIFF'S MOTION FOR
DEFAULT**

NOTE ON MOTION CALENDAR:
NOVEMBER 2, 2022

16 I, William H. Walsh, hereby declare as follows:

17 1. I am attorney of record for the Plaintiff, Cozen O'Connor in the above-entitled
18 action, and I am familiar with the file, records and pleadings in this matter. I make this
19 declaration based upon my personal knowledge in support of Plaintiff's Motion for Entry of
20 Default Judgment.

21 2. Defendants Defendant STB, Inc. d/b/a STB Lifesaving Technologies, Inc., was
22 served with the Summons and Complaint in the above-captioned matter, with the first date of
23 service occurring on February 24, 2017.

24 3. On June, 13, 2017, Plaintiff filed a status report with the Court notifying it that
25 STB had entered into a receivership proceeding filed in King County Superior Court under
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DECLARATION OF WILLIAM H. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT - 1

Case No.: 17-cv-00139-RAJ

LAW OFFICES OF
COZEN O'CONNOR
A PROFESSIONAL CORPORATION
SUITE 1900
999 THIRD AVENUE
SEATTLE, WASHINGTON 98104
(206) 340-1000

1 Cause No. 17-2-06030-5, and this matter was subsequently stated pending the outcome of the
2 receivership action. On June 9, 2022, the state Court approved the receivership's final
3 accounting and entered an Order terminating the case.

4 4. On August 22, 2022, Plaintiff notified this Court of the same and on September
5 9, 2022, this Court entered an Order lifting the stay. During this time, the Court contacted the
6 parties of record and asked Mr. Jackson if he intended on filing a notice of appearance on
7 behalf of the Defendant, however no response was received and the Defendant has failed to
8 respond to the allegations contained in Plaintiff's Complaint.

9 5. Defendant has failed to plead or otherwise defend with regard to the plaintiff's
10 judgment for affirmative relief as sought in this matter's Complaint.

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12 DATED: October 14, 2022.

13 /s/ William H. Walsh
14 William H. Walsh
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DECLARATION OF WILLIAM H. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT - 2

Case No.: 17-cv-00139-RAJ

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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies, under penalty of perjury under the laws of the State
3 of Washington, that I electronically filed the foregoing document with the Clerk of the Court
4 using the CM/ECF system which will send notification of such filing to the registered ECF
5 recipients at their registered emails as follows:

6 **VIA ECF EMAIL NOTIFICATION**

7
8 Dillon E. Jackson, WSBA No. 1539
Law Office of Dillon E. Jackson PLLC

9 Phone: (206) 693-3605 or (206) 245-9801
10 Email: djlawpllc@gmail.com

11 ***Attorneys for Defendant STB***

12 Kevin Hanchett, WSBA No. 16553
13 Resource Transition Consultants LLC
14 4100 194th Street SW, Suite 208
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15 Phone: (425) 678-8162
Email: hanchett@rtcreceivers.com

16 ***Attorneys for Receiver of STB***

17
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19 DATED this 14th day of October, 2022.

20 COZEN O'CONNOR

21 By: /s/ Erin N. Gilbert
22 Erin N. Gilbert, Legal Assistant
23 999 Third Avenue, Suite 1900
Seattle, WA 98104
24 Telephone: 206.340.1000
Toll Free Phone: 800.423.1950
25 Facsimile: 206.621.8783

26 DECLARATION OF WILLIAM H. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT - 3

Case No.: 17-cv-00139-RAJ

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